

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,)	
)	
Plaintiff,)	C.A. No. 06-726 (JJF)
)	
CHI MEI OPTOELECTRONICS)	
CORPORATION; AU OPTRONICS)	
CORPORATION; AU OPTRONICS)	
CORPORATION OF AMERICA;)	
TATUNG COMPANY; TATUNG)	
COMPANY OF AMERICA, INC.;)	
AND VIEWSONIC CORPORATION,)	
)	
Defendants.)	

**DECLARATION OF LI-YI CHEN IN SUPPORT OF CHI MEI
OPTOELECTRONICS CORPORATION'S MOTION TO DISMISS**

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Chi Mei Optoelectronics Corporation*

Dated: April 6, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 06-726 (JJF)
)	
CHI MEI OPTOELECTRONICS)	
CORPORATION; AU OPTRONICS)	
CORPORATION, AU OPTRONICS)	
CORPORATION OF AMERICA;)	
TATUNG COMPANY; TATUNG)	
COMPANY OF AMERICA, INC.; AND)	
VIEWSONIC CORPORATION,)	
)	
Defendants.)	

DECLARATION OF LI-YI CHEN IN SUPPORT OF
CHI MEI OPTOELECTRONICS CORPORATION'S MOTION TO DISMISS

I, Li-Yi Chen, hereby declare and state as follows:

1. I make this Declaration in support of the Chi Mei Optoelectronics Corporation's Motion to Dismiss Plaintiff's Complaint for Patent Infringement for Lack of Personal Jurisdiction and Insufficiency of Service of Process. The statements made in this Declaration are based on my own personal knowledge and on information that I believe to be true and correct, and if called as a witness, I could and would testify competently to the following facts.

2. I am the Deputy Head Director of LCD TV Business Division of Chi Mei Optoelectronics Corporation ("Chi Mei"). Chi Mei is a corporation organized and existing under the laws of Taiwan with its principal place of business in Sinshih Township, Tainan County, Taiwan.

3. The principal business of Chi Mei is the manufacture and sale of thin film transistor (TFT) panels for liquid crystal displays. Chi Mei generally sells such panels to customers who subsequently incorporate the components into computer monitors, notebooks and LCD TVs.

4. Chi Mei has never purposefully conducted business activities in Delaware. Chi Mei has never purposefully directed business activities to Delaware. While Chi Mei owns stock in a subsidiary, Chi Mei Optoelectronics USA, Inc., which is a Delaware corporation with its principal place of business in California, and is a partner in a joint venture company named iZ3D, LLC, which was formed as a Delaware company and has its principal place of business in California, Chi Mei is not currently, and never has been, qualified, authorized, or otherwise chartered, registered, or licensed to conduct or transact business in Delaware. Chi Mei has never had any officers, employees, sales representatives, distributors, brokers, agents, or other representatives in Delaware. Chi Mei has never had an office or telephone listing in Delaware. Chi Mei has never used, owned, leased, or rented any real or personal property in Delaware.

5. Chi Mei has never maintained a bank account in Delaware. Chi Mei has never paid income or property taxes in Delaware. Chi Mei has never borrowed or invested any money in Delaware.

6. Chi Mei has never sold components for liquid crystal displays to consumers or retailers, including consumers or retailers in Delaware. Chi Mei has never sold components to OEMs or others with the intent or for the purpose of selling those products in Delaware. Chi Mei has never designed, manufactured, packaged, marketed, advertised, sold, or distributed any products, services, or raw materials in Delaware or to consumers in Delaware. Chi Mei has

never caused, instructed, or directed any third party to design, manufacture, package, market, advertise, sell, or distribute any products, services, or raw materials in Delaware or to consumers in Delaware. Chi Mei has never conducted any research or testing activities in Delaware. Chi Mei has never advertised in Delaware newspapers or any other Delaware medium. Chi Mei has never had or made any arrangements to market its products in Delaware. Chi Mei has never had any business plan to target Delaware residents as customers for its products or to deliver products to consumers in Delaware.

7. Chi Mei has never maintained any inventory in Delaware, shipped any inventory to Delaware, or received raw materials or supplies from Delaware. Chi Mei has not caused, instructed, or directed any third party to maintain inventory in Delaware, ship inventory to Delaware, or receive raw materials or supplies from Delaware. Chi Mei has never exported, imported, shipped, or otherwise transferred products, raw materials, or supplies into or out of Delaware. Chi Mei has never transferred proprietary information, raw materials, or supplies into or out of Delaware.


8. Chi Mei has never executed any contract in Delaware, or contracted with any party to manufacture, buy, sell or distribute products or services in Delaware. Chi Mei has never maintained, or caused, instructed, or directed any third parties to maintain, any agents, distributors, brokers, wholesalers, or other representatives in Delaware for the transaction of business of any nature. Chi Mei has never maintained, or caused, instructed, or directed any third parties to maintain, any agents, distributors, brokers, wholesalers, or other representatives for the purpose of transacting business in Delaware. Chi Mei has no agent to accept service of process in Delaware.

9. Chi Mei has never commenced any legal action or proceeding in Delaware.

10. Chi Mei has never offered a warranty on products, warranty services, or repair services for products in Delaware or to consumers in Delaware. Chi Mei does not provide advice or support services to consumers in Delaware. Chi Mei has never offered or provided customer support via telephone, Chi Mei's internet website (which is operated and hosted for Chi Mei in Taiwan), or otherwise for products in Delaware or to any consumers located in Delaware. Chi Mei's products or services cannot be purchased or otherwise obtained through its website.

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Date: April 4th, 2007


Li-Yi Chen 4 Apr '07

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on April 6, 2007, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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I hereby certify that on April 6, 2007 I have sent the foregoing document by

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